



March 10, 2010

Sustainable Communities Planning Grant and Incentives Program
c/o The Department of Conservation
Office of Sustainability
801 K Street, MS 24 -01
Sacramento, CA 95814

RE: Set-aside for Disadvantaged Communities in Sustainable Communities Planning Grants

On behalf of California Rural Legal Assistance Foundation and PolicyLink, we are writing to offer brief comments on the Final Draft Guidelines for the Sustainable Communities Planning Grants.

This most recent draft of the Guidelines incorporates changes that address several of the key comments offered by stakeholders. However, the Guidelines still do not adequately address the needs of disadvantaged communities. We believe the best means of doing so is to establish a set-aside that specifically targets disadvantaged communities, similar to the set-aside established by the Council for the Urban Greening Planning grant program.

Without a set-aside, it is unlikely that proposals will truly target disadvantaged communities, because there is little incentive for local governments to elevate that sort of planning over other planning needs in their community. A set-aside gives local governments the incentive because it provides a pot of money that is only available to those willing to target the needs of disadvantaged communities.

It is worth noting that the guidelines currently allow only one proposal from each applicant (i.e. each city or county). Thus, if a city chooses to target a disadvantaged community they must do so at the expense of other competing projects in their jurisdiction. Our guess is that under that system, proposals targeting disadvantaged communities are unlikely to be prioritized. A set-aside essentially eliminates that competition by allowing a local government to submit two proposals, one for the set-aside and one for the main pot of funds.

We would suggest the following language to implement the set-aside:

At least 20 percent of each round of funding shall be prioritized for projects that target economically disadvantaged communities (EDC). Projects seeking the EDC prioritized funds must show that the planning to be funded would be primarily or substantially within the geographic boundaries of an EDC. An EDC may be a community or neighborhood within a city or county. To the extent appropriate, applications for funding from the set-aside should be integrated and coordinated with the entity's application under the main program.

In order to ensure that disadvantaged communities are not left behind in local and regional sustainable planning, it is critical that we establish incentives to plan for their needs. A set-aside would achieve that objective, and we urge the Council to amend the guidelines to establish such a set-aside. If you have any questions please contact Brian Augusta at (916) 446-9241 or Brian@housingadvocates.org.

Sincerely,

A handwritten signature in black ink that reads "Brian Augusta". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Brian Augusta, Staff Attorney
CRLA Foundation

A handwritten signature in black ink that reads "Judith Bell". The signature is cursive and somewhat stylized, with the first name being more prominent.

Judith Bell, President
Policy Link